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ABSTRACT

One of a series of sixteen knowledge transformation papers, this paper combines a glimpse at historical origins of the relationship between vocational education and employment training programs with an examination of current vocational education-CETA (Comprehensive Employment and Training Act) relationships. While research and development are recommended to improve the understanding of these relationships, emphasis is also given to the idea that cooperative efforts provide a means to improve individual well-being through enhanced labor market opportunity. Besides citing major research and legislation affecting vocational education and federal involvement in employment and training, comparisons are drawn between vocational education and CETA in the following areas: allocation of federal funds, target groups, delivery systems, and interaction. Then, the eight titles of the CETA Amendments of 1978 are summarized. Next, examples are given of recent institutional change produced by YEDPA (Youth Employment Demonstration Programs Act). After describing these present organizational possibilities, their translation into probability statements is considered. Also included is a recommended research agenda for determining organizational objectives and who can be helped, under what circumstances, and at what cost. The appendixes show the evolution of the CETA titles, the allocation of CETA funds, and formulas for their allocation. (ELG)

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Information Series No. 151

THE COORDINATION OF VOCATIONAL EDUCATION PROGRAMS WITH CETA

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U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
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FOREWORD

Increasing federal emphasis on employment and training programs to meet the needs of the disadvantaged has alerted vocational educators to the importance of such programs as they relate to the goals and client groups of vocational education. Considerable discussion has already taken place on the possibilities of coordination between vocational education and programs funded under the Comprehensive Employment and Training Act (CETA). A major new initiative has recently been announced by the U. S. Office of Education and the U. S. Department of Labor to coordinate vocational education and employment and training organizations mandated under the 1976 vocational education amendments and the 1978 CETA amendments. In light of such cooperative efforts, this paper reviews the background behind vocational education and employment and training programs, compares vocational education and CETA, outlines the provisions of the CETA amendments of 1978, and makes recommendations for research priorities.

"The Coordination of Vocational Education Programs with CETA" is one of a series of 16 papers produced during the first year of the National Center's knowledge transformation program. The 16 papers are concentrated in the four theme areas emphasized under the National Center contract: special needs subpopulations, sex fairness, planning, and evaluation in vocational education. The review and synthesis of research in each topic area is intended to communicate knowledge and suggest applications. Papers should be of interest to all vocational educators, including administrators, researchers, federal agency personnel, and the National Center staff.

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INTRODUCTION

The timing of this paper coincides with announcement of a major new cooperative initiative by the Bureau of Occupational and Adult Education, U.S. Office of Education, and the Office of Youth Programs, Employment and Training Administration, Department of Labor. This initiative is intended to comply with mandates for coordination of vocational education and employment and training organizations set forth in the vocational education amendments of 1976, and the Comprehensive Employment and Training Act (CETA) Amendments of 1978 (P.L. 95-524):

> The joint national initiative will have four staff components: an advisory body and a policy panel including elementary and secondary personnel; intra-agency support staff to provide a technical strategy; interagency education and labor support staff consultants; and a working core of intra-agency support staff. (Manpower and Vocational Education Weekly, December 7, 1978, p. 9)

Four demonstration projects beginning in September, 1979 will be conducted through this interagency agreement:

1. A vocational education incentives program, which will foster collaboration
2. An in-school youth work project
3. An Upward Bound project based on summer youth program experience to date
4. Work-education councils

The objective of this paper is to recommend research and development that will improve our understanding of organizational behavior in these arenas and help us detect relationships between organizational structure and effectiveness on behalf of clients. Landmark vocational education and employment and training legislation is outlined and current cooperative mandates examined in detail. Available evidence concerning actual administrative practices in these respects is explored. Research priorities are discussed in a concluding section.

The underlying theme of the paper is that cooperative vocational education-CETA relationships should be designed primarily as a means to achieve the following end: improvement of individual well-being through enhanced labor market opportunity. Promotion of coordination and cooperation between CETA and vocational education should therefore be guided, at least in part, by the anticipated effect such linkages will have on subsequent client labor market opportunities. Too often institutional relationships are fostered or discouraged with little or no consideration of the consequences these actions will have for labor market opportunities of clients. The gulf which currently exists between studies of organizational behavior and assessments of

client outcomes is identified as a major barrier to understanding how an integrated vocational education and employment and training system can contribute to the enhancement of individual labor market opportunity.

BACKGROUND

Vocational Education

The historical evolution of vocational education is well documented (Ruscio, 1977; Giodarno and Praeger, 1977; Lazerson and Grubb, 1974; Bolino, 1972.).

An abbreviated version of the history of vocational education begins with the Morrill Acts of 1862 and 1890 which authorized the first federal participation in vocational education through the establishment of land grant colleges. The American Federation of Labor (1886), National Association of Manufacturers (1895), National Society for the Promotion of Industrial Education (1906), and other national organizations thereafter promoted federal funding for vocational education to sustain the industrialization process and to improve the relevance of education curricula. Congress responded by appointing a Commission on National Aid to Vocational Education in 1914, which formed the basis for the Smith-Hughes (Vocational Education) Act of 1914. This legislation adopted a categorical conception of occupational development of skills, authorized federal aid for a limited number of occupations, and established a Federal Board for Vocational Education. The Smith-Hughes provision that states match federal funds assured a partnership in supporting vocational training which continues to this day. The George-Dean Act of 1936 extended federal support to distributive curricula. The George-Barden Act of 1946 increased funding levels and provided greater curriculum flexibility, but still within a categorical program framework. The Vocational Education Act of 1963 (VEA), and subsequent amendments through 1976, strongly affirm two principles of federal involvement in vocational education:

1. Funds should be provided to states in a noncategorical (block grant) manner for allocation among occupational program categories which best serve state needs.
2. Funds are to be focused on serving economically and educationally disadvantaged persons.

Before progressing further, one important point should be emphasized. No attempt is made here to determine the boundary between skill development as an educational activity and training as a labor market phenomenon. The distinction between vocational education and employment and training that is adopted throughout this paper merely reflects an acknowledgment of the present bureaucratic structure of government.

Employment and Training

Again, there are many available sources (Davidson, 1972; Mangum, 1969; Levitan and Taggart, 1971) that document the evolution of federal involvement in employment and training programs. Paralleling the growth and periodic restructuring of vocational education, the employment and training program network has evolved from origins based on specific circumstances. In order to explain this evolution, the personalities and situations involved should be described.

The Area Redevelopment Act, ARA (1961), Manpower Development and Training Act, MDTA (1962), Economic Opportunity Act, EOA (1964), and Model Cities (1965) legislation were enacted. These four statutes grew out of alleged area-specific and population group problems. The MDTA found initial support in the specter of technological unemployment, that is, sudden obsolescence of skills which had previously produced adequate earnings. But the constituency of MDTA soon broadened as economic conditions improved in the mid-1960s.

For this discussion the following observations pertinent to this legislation will be important:

1. Once enacted, legislation like the ARA and the MDTA created bureaucracies which then cast about for new constituencies.
2. The U. S. Department of Labor was in an ideal position to absorb programs that it had administered under EOA auspices, when the Office of Economic Opportunity came under fire.
3. The Concentrated Employment Program (CEP) effort to target resources and promote interagency cooperation, and the Cooperative Area Manpower Planning System's (CAMPS) weaknesses, provided early evidence of the difficulties which can be expected when cooperation is mandated without providing adequate sanctions or incentives.

Davidson (1972) has captured the essence of the 1960s era of employment and training policy by stating:

> Program fragmentation is a product not only of agency rivalries but also, and more fundamentally, of the manner in which policies are formulated and sustained in a pluralist political system. As each new pressing need is identified and publicized, a remedy or palliative is fashioned in the form of a governmental program. Thus governmental involvement tends to be a mosaic of single-purpose efforts, with inevitable discord. Once a program is launched, its authors, implementors, and clients comprise a lobby dedicated to perpetuating the activity. (p. 7)

At the same time, new adversary relationships appeared as competition for federal funds created new types of organizational instability. The Emergency Employment Act (1971) authorized a small-scale version of what was soon to

become the dominant component of Department of Labor funded employment and training activity--Public Service Employment (PSE). Some decentralization of employment and training programs occurred when the Comprehensive Employment and Training Act of 1973 (CETA) was enacted. Direct funding of units of local government, including Balance-of-State areas, contrasts sharply with vocational education's practice of making grants-in-aid to states. For FY 1979 the prime sponsor network includes: 66 cities; 180 counties; 144 consortia (combinations of city and/or county governments); 49 states and territories; 20 cities, counties or rural areas operating under exceptional circumstances, or as concentrated employment programs; and 170 Native American organizations.

Since the treatment of vocational education in the CETA Amendments of 1978 will be examined later, no more general historical background is necessary here. However, the evolving youth focus of employment and training programs deserves attention. This emphasis began with youth-oriented amendments to the MDTA in 1963, and included creation of both in-school and out-of-school components of the Neighborhood Youth Corps (NYC) and Job Corps in the EOA of 1964, the Apprenticeship Outreach Program (AOP) in 1968, and, since 1968, the Summer Program for Economically Disadvantaged Youth (SPEDY) under CETA auspices. The result was the enactment of the Youth Employment and Demonstration Projects (YEDPA) in August 1977 (Taggert, 1976; 1978).

The YEDPA, which was consolidated into the CETA Amendments of 1978 as Title IV, Part A, included a Youth Employment and Training Program (YETP) component which is now Subpart 3 of Title IV Part A. In practice, this component has exhibited a heavy work experience emphasis, although it was written to permit the entire range of services available in Title I (now Title II) of the CETA. Also authorized through YEDPA auspices were a Young Adult Conservation Corps (YACC), a Youth Community Conservation and Improvement Projects (YCCIP) component, and a Youth Incentive Entitlement Pilot Projects (YIEPP) component.

The Secretary of Labor is to report to Congress no later than March 1, 1980 "...proposals for the integration and consolidation of the programs established by Part A of Title IV and Title VII with the program established by Title II" (Section 127(C)). (The content of each of these titles is described in a subsequent section of this paper.) Funding authorization is provided for Part A of Title IV only for fiscal years 1979 and 1980, and the Office of Management and Budget has proposed drastic cuts in funding for FY 1980 in keeping with President Carter's goal to reduce the size of the anticipated federal budget deficit for that year.

Reauthorization of both the VEA and the CETA must be considered in 1982. Hopefully, substantial progress will have been made by then in our understanding of the issues dealt with in the remainder of this paper.

VOCATIONAL EDUCATION AND CETA: COMPARISONS

Allocation of Federal Funds

Vocational education is a state program, while CETA is controlled by units of local government, except for Balance-of-State prime sponsors (Anderson and Rozansky, 1976). To receive vocational education funds, states submit a general application, a five-year plan, and an annual plan.

The allocation factors for vocational education funds which are available to the states are: population size, age distribution, and average per capita income. Of the amount available for distribution to the states, fifty percent is based on the age group 15-19; twenty percent on the age range 20-24; and fifteen percent each on the age interval 25-65 and the prior distribution ("Distribution of Funds," 1978). Each state is assigned an allotment ratio which is based on average per capita income over the most recent three years for which data are available. A dollar-for-dollar state matching of funds is required for Part B, state program allocations (U.S. Department of Health, Education and Welfare, 1976a). This basic grant comprises eighty percent of available funds allotted under Section 102(a) of the Vocational Education Act. The remaining twenty percent of funds distributed under this part is for program improvement and supportive services, exemplary and innovative programs, and curriculum development programs. A separate federal allocation to predetermined local areas, which does not require state matching, is earmarked for programs for disadvantaged persons in areas with high youth unemployment and high percentages of high school dropouts.

CETA funding is more complex than vocational education distributions. Basically, the relative number of unemployed persons, the relative number of persons in families with an annual income below the low-income level, and the relative number of unemployed persons residing in areas of substantial unemployment are the key factors considered. However, definitions vary by title. "Relative number" refers to interstate comparisons, and the Secretary of Labor is directed to act in accordance with these factors in determining prime sponsor allocations within states. Specific provisions are examined in the section of this paper which explores the CETA Amendments of 1978. Following vocational education's lead, there is provision for forward funding of CETA programs in the 1978 amendments (Section 112(d)(1)), which will improve planning opportunities if it is actually implemented through the appropriations process.

Target Groups

Vocational education programs address <u>educational</u> disadvantagement, which includes <u>economic</u> disadvantagement, but the preamble to the VEA specifically refers to the need to serve all people of all ages, with set-asides for special target groups. The time frame for individual development is usually longer than one year, and a variety of activities may be involved, although skill development remains a core feature.

CETA programs are targeted on those who exhibit economic disadvantagement, which is frequently assumed to be indicative of a need for training, and are unemployed, underemployed, or in school (effective with the 1978 CETA Amendments). The CETA Amendments of 1978 emphasize these criteria. The time frame for employment, training, and supportive service activities is much shorter and more varied than that of many vocational education programs; however, important exceptions are to be found. The range of services provided for an individual has varied widely among prime sponsors. Institutional skill training has diminished in relative importance from the early years of MDTA in many areas; but in others, such as Chicago, it has been expanded to replace some work-experience activities. Observed diminution of skill training in some locales has been attributed to hold-harmless provisions of YEDPA which affect youth work experience funded through Title I.

Delivery Systems

The vocational education system is largely dependent upon an already existing inventory of buildings, equipment, and certified staff members. There are costs of being first on the scene, and a loss of flexibility is a major cost. Enrollment growth in the 1960s coincided with the availability of MDTA and Economic Development Administration (EDA) funds, which allowed rapid expansion of both physical and faculty resources. These resources are now in place, and both enrollment patterns and the availability of competing services threaten the stability of the vocational education system.

The CETA system is ostensibly open with regard to the selection of program operators. There are no mandated presumptive service agents, although the CETA Amendments of 1978 stress the prime sponsor's responsibility to use existing organizations of demonstrated effectiveness. However, in practical terms it would be difficult for a prime sponsor to ignore an existing skill center begun under MDTA auspices. The absence of a presumptive mandate does not short-circuit well-established local power relationships and constituent obligations. Of particular importance to vocational educators in this regard is the role of community-based organizations (CBOs). Historical relationships between the vocational education community and constituents of some of the CBOs do not appear encouraging for future voluntary cooperation. In part, this coolness arises from different overall agendas. Vocational education systems must try to serve all interested individuals. CBOs typically serve a much more homogeneous constituency. There are administrative tactics available to accomplish at least some degree of cooperation. Classroom training funds can be channeled through the vocational education system to CBOs which qualify as state-certified local education agencies (LEAs), for example.

Interaction

There are two quite distinct aspects of cooperative ties between the vocational education and CETA systems: the opportunity to cooperate, and the incentive to do so. Both the Vocational Education Act, as amended, and the CETA Amendments of 1978 provide opportunity for cooperation. However neither piece of legislation stresses incentives except the designation of CETA funds, which may create an atmosphere which is less conducive to genuine cooperation than would exist otherwise. (For a more hopeful view of cooperation see Mangum, 1975 and Bushnell, 1978). Current ties are usually informal, unstable, and less than satisfactory in terms of mutual program objectives. Anecdotal evidence from professional staff persons in the CETA system suggests that LEA administrators above the vocational division represent a major barrier to effective working relationships.

Consider the following excerpts from Roman Pucinski's testimony before the Senate in its recent deliberations concerning CETA reauthorization (1978):

> There has not been sufficient emphasis on training, under CETA, to provide individuals with the skills they need to make it on their own when the program ends. (p. 2)
>
> CETA has not adequately focused on the problems of the structurally unemployed, has not served those who need the assistance the most, and has not provided the education and training which would qualify them for new jobs in an expanding economy. (p. 5)
>
> We must deal with the total person and provide basic communication skills, when necessary, to enhance job skills. (p. 5)
>
> Training programs should not be geared only to the needs of a local labor market but should not exceed national needs. (p. 6)
>
> Wherever possible, the existing cooperative education programs under the Vocational Education Act--which are targeted to areas with high rates of school dropouts and youth unemployment--should be expanded. (p. 10)

The issue could not be more sharply drawn. What is the proper emphasis to be placed on education and training through CETA auspices, and what should vocational education's role be in meeting this need (Kowle, 1978)? These questions can only be addressed in the context of a clear understanding of current law and administrative practices.

THE CETA AMENDMENTS OF 1978

The Comprehensive Employment and Training Act, as amended in 1978, contains eight titles. Four of these titles include provisions which should be of

major interest to vocational educators. These provisions are described below. First, the State of Purposes of the Act should be noted:

> It is the purpose of this Act to provide job training and employment opportunities for economically disadvantaged, unemployed, or underemployed persons which will result in an increase in their earned income....It is further the purpose of this Act to provide for the maximum feasible coordination of plans, programs, and activities under this Act with economic development, community development, and related activities, such as vocational education. (emphasis added) (Sec. 2).

In other words, there is an explicit outcome objective, the increase in earned income, with an associated designation of target groups. There is also an independent statement of a process goal, to promote coordination, which includes vocational education. The process goal might be interpreted as an intermediate step toward achieving the desired increase in earned income. The overall theme of this paper, however, is that organizational behavior issues have not been assessed on these terms. In addition, there are other possible explanations for this stated purpose which will be discussed later.

Title 1: Administrative Provisions

This title makes repeated reference to organizational provisions involving vocational education systems. Each prime sponsor's comprehensive employment and training plan, which consists of a long-term master plan and an annual plan, must include a detailed description of:

1. the methods and institutional arrangements which will be used to involve...educational agencies...
2. the methods and criteria which will be used to select such deliverors of services from an inventory of potentially available deliverors of services...
3. appropriate arrangements with educational agencies serving youth...for their participation in the planning of programs included in the plan
4. (provisions) for utilizing those services and facilities which are available...to the extent deemed appropriate by the prime sponsor after giving due consideration to the effectiveness of such existing services and facilities including...State vocational education,...area skill centers, local educational agencies, (and) postsecondary training and education institutions...but nothing contained herein shall be construed to limit the utilization of services and facilities of private agencies

5. arrangements for (i) the use of skills centers...and (ii) the use of other public vocational education facilities in such area...; (and) a description of arrangments to promote maximum feasible use of apprenticeship or other on-the-job training opportunities...
6. arrangements made to ensure the participation of and consultation with local educational agencies, (and) vocational education agencies...
7. evidence that in the development of such a plan there has been a continuing process of consultation with interested groups in the area not directly represented on the prime sponsor's planning council, including local advisory councils...
8. the procedures concerning academic credit developed in conjunction with the appropriate local educational agency (Sec. 103)

These requirements for the prime sponsor's comprehensive employment and training plan provide adequate evidence of the intention of Congress to utilize local vocational education facilities and programs when this is consistent with effective achievement of prime sponsor objectives.

Each prime sponsor must designate a planning council, including a representative of vocational education agencies in the area, to:

> participate in the development of, and submit recommendations regarding, the prime sponsor's comprehensive employment and training plan and the basic goals, policies, and procedures of the prime sponsor's programs and of other employment and training programs in the prime sponsor's area. (Sec. 109)

In addition to these provisions for each prime sponsor, any state seeking CETA funds is required to prepare a Governor's Coordination and Special Services Plan which provides for:

1. coordinating all employment and training, education, and related services provided by the State, by prime sponsors, by State education agencies and other appropriate institutions of vocational and higher education... (Sec. 105)
2. assuring that comprehensive employment and training plans do not unnecessarily result in the duplication of services...
3. assuring the promotion of prime sponsor planning that takes into account...vocational education...
4. providing labor market and occupational information to prime sponsors and appropriate educational agencies and institutions without reimbursement (Sec. 105)

The State Employment and Training Council (was State Manpower Services Council), must include at least one representative each from the state board of vocational education and the State Advisory Council on Vocational Education, and is charged to:

1. identify, in coordination with the State Advisory Council on Vocational Education, the employment and training and vocational education needs of the State and assess the extent to which employment and training, vocational education...and other programs assisted under this and related Acts represent a consistent, integrated, and coordinated approach to meeting such needs...
2. comment at least once annually on the reports of the State Advisory Council on Vocational Education...
3. review the comprehensive employment and training plans of prime sponsors..., especially with respect to nonutilization or duplication of existing services (Sec. 110; 129(b))

Neither the State Employment and Training Council nor the prime sponsor planning council have direct sanctions for prime sponsor failure to abide by their recommendations. There is provision for the Secretary of Labor to require a prime sponsor to conform to recommendations made by either group if this is necessary to improve the administration and effectiveness of its programs (Sec. 104(c)(1)). Each prime sponsor is required to include in its Comprehensive Employment and Training Plan planning council recommendations which were not included together with the reasons for rejecting them (Sec. 103(a)(17)).

It is concluded that ample enabling language exists to permit CETA-vocational education cooperation. However, there is evidence that these enabling provisions are recognized as being inadequate by themselves to accomplish full cooperation.

Title II: Comprehensive Employment and Training Services

Six percent of funds made available for "Services For The Economically Disadvantaged" and "Upgrading and Retraining" under this Title (Sec. 202(b) and Sec. 204) are earmarked for grants for supplemental vocational education assistance. Two billion dollars is authorized for Parts A, B and C of Title II for FY 1979, so that the authorization is $120 million. This is an increase over the previous set-aside of five percent. These grants are made to governors operating through state vocational education boards "to provide needed vocational education services in areas served by prime sponsors, in accordance

with an agreement between the state vocational education board and the prime sponsor" (Sec. 204(a)(1)). This funding indicates a lack of Congressional confidence in the sufficiency of Title I organizational provisions to achieve the desired level of vocational education participation in CETA programs through regular Title II contracting provisions. However, earmarking creates an interpretive ambiguity in terms of whether funding is intended to be a minimum or maximum allocation. Readers who quickly respond that it is obviously a minimum fail to recognize the psychological effect on prime sponsors of seeing any part of resources that might potentially have been theirs given to a designated external organization, particularly when autonomy of local decision making is stressed at the same time. (The original Carter proposal for amending CETA provided for a five percent allocation directly to each prime sponsor earmarked for grants for vocational education services.) Those who would comment that these six percent funds go directly to governors, not to prime sponsors, miss the point that prime sponsors view these funds as having been withdrawn from their control; that is, the funds should be theirs to allocate as they see fit.

At least eighty-five percent of this six-percent allocation must be used for providing vocational education and services to participants in Title II programs. The remainder of the six-percent allocation is available:

1. to coordinate programs under this Act with existing vocational education programs
2. to coordinate the utilization of funds under this Act and the Vocational Education Act of 1963 to enhance economic growth and development in the State
3. to develop linkages between vocational education, education and training programs under this Act and private sector employers
4. to provide technical assistance to vocational education institutions and local education agencies to aid them in making cooperative arrangements with appropriate prime sponsors
5. to provide information, curriculum materials, and technical assistance in curriculum development and staff developments to prime sponsors (Sec. 204(c)(2))

An additional one percent of the amount available for this title is given to the governor for encouraging coordination and establishing linkages between prime sponsors and appropriate educational agencies and institutions, and for services for eligible participants through such auspices (Sec. 202(d)).

All Title II Part B services are restricted to economically disadvantaged persons who are unemployed, underemployed, or in school (Sec. 213, Sec. 3(8), Sec. 214, "Services for Youth").

Title II Part C provides for occupational upgrading and retraining, including supportive services, conducted directly or through agreements with public and private employers or other organizations or agencies (Sec. 221(b)(1)).

Title III: Special Federal Resonsibilities

There are numerous opportunities for vocational education systems to become involved in programs funded under this title, which include programs for displaced homemakers, offenders, persons of limited English language proficiency, handicapped individuals, single parents, youth, older workers, individuals who lack educational credentials, public assistance recipients, and Native Americans. However, there are no specific references made to vocational education institutions in the title. On the other hand, partnerships between prime sponsors and other organizations are specifically mentioned in Sec. 307(a) for discretionary funding consideration by the Secretary of Labor.

Title IV: Youth Programs

As stated in the legislation:

> It is the purpose of this title to provide a broad range of coordinated employment and training programs for eligible youth in order to provide effectively for comprehensive employment and training services to improve their future employability and to explore and experiment with alternative methods for accomplishing such purposes. (Sec. 401)

There are three parts to this title: Part A--Youth Employment Demonstration Programs; Part B--Job Corps; and Part C--Summer Youth Program. Assurance of coordination with activities conducted under the Career Education Incentive Act is required.

Youths aged 16-19 whose family income is at or below the poverty level are the only ones eligible for enrollment in Youth Incentive Entitlement Pilot Projects (YIEPP). Only economically disadvantaged youths, aged 16-21, who are either unemployed or in school are eligible for the other Part A programs (Job Corps and Summer Youth Program participation). Fourteen and fifteen year-olds may be eligible if authorized by Secretary of Labor regulation.

The YIEPP and Youth Community Conservation and Improvement Projects (YCCIP), Subparts 1 and 2 of Title IV Part A, have been determined for FY 1979. Together they receive thirty percent of Part A funds (Sec. 416, Sec. 421). Brief descriptions of their purposes and current status are presented in another section. Subpart 3: Youth Employment and Training Programs (YETP) is the focal point of CETA-vocational education cooperation at the local level. Seventy percent of Part A funds are allocated for this subpart. The legislation states:

> It is the purpose of this subpart to establish programs to make a significant long-term impact on the structural unemployment problems of youth, supplementary to but not replacing programs and activities available under Title II of this Act. (Sec. 431)

Sixteen categories of appropriate services for funding under this part are listed, including: outreach, assessment, orientation, counseling, development of information, literacy training, attainment of equivalency certificates, job-sampling, institutional and on-the-job training, job development, job re-structuring, and placement assistance (Sec. 432 (3)(A)-(P)).

Seventy-five percent of funds available for YETP go directly to prime sponsors on a formula basis (Sec. 433(b)). From this amount, not less than 22 percent:

> shall be used for programs for in-school youth carried out pursuant to agreements between prime sponsors and local education agencies....Participants who are enrolled or who agree to enroll in a full-time program leading to a secondary school diploma, a junior or community college degree, or a technical or trade school certificate of completion [are eligible]. Each such agreement shall contain provisions to assure that funds received pursuant to the agreement will not supplant State and local funds expended for the same purpose. (Sec. 433(d)(2))

The twenty-two percent set-aside can become a target share rather than the intended minimum threshold. Again however, some prime sponsors commit much more than this percentage to these purposes. Eligibility is restricted to youths 16-21 who are in school or are unemployed or are underemployed and whose family income does not exceed eighty-five percent of the lower living standard income level (Sec. 435(2)). There are three exceptions to this limitation:

1. Ten percent of funds available for this subpart may be used for programs which include youths of all economic backgrounds to test the desirability of including youths of all economic backgrounds. (See YEDPA Rules and Regulations, Federal Register, 43 (April 7, 1978), 97.716(d))

2. The Secretary of Labor may authorize by regulation participation of 14 and 15 year olds who are in school.

3. The Secretary of Labor may waive by regulation the family income ceiling.

Five percent of the funds available for YETP go directly to governors for special statewide youth services (Sec. 433(a)(2) and (c)). An approved special statewide youth services plan is required for receipt of these funds. Six types of cooperative, experimental, and model programs are described in the law.

Each prime sponsor who receives funds under YETP must establish a youth council, including representation of the local vocational education advisory council (Sec. 436(a)(7) and (b)). This council is responsible for making recommendations to the prime sponsor planning council on activities conducted under YETP and YCCIP.

Finally, the legislation states that:

> suitable arrangements [should be made] with appropriate state and local education officials whereby academic credit may be awarded, consistent with applicable state law, by educational institutions and agencies for competencies derived from work experience obtained through programs established under this part. (Sec. 445(b); 426(b)(2); 427(b)(2); 443(f)(1)(B); 445(a))

Work experience programs for in-school youth funded under YETP require an agreement between the prime sponsor and a local education agency or agencies that assures the substance of the program and the review of the agreement by the youth council.

The language of Title IV permits close cooperation between vocational education institutions and related prime sponsor activities.

Title V: National Commission for Employment Policy

This commission, which has been called the National Commission for Manpower Policy until now, is the CETA counterpart of the National Advisory Council on Vocational Education. In turn, a representative of the National Advisory Council on Vocational Education is a mandated member of the commission. One of ten designated functions of the commission is to:

> Identify, after consultation with the National Advisory Council on Vocational Education, the employment and training and vocational education needs of the Nation and assess the extent to which employment and training, vocational education, vocational rehabilitation, and other programs assisted under this and related Acts represent a consistent, integrated, and coordinated approach to meeting such needs. (Sec. 503(5); also see VEA, Sec. 162(b)(4)(A))

Again, the statement of purpose is clear. CETA and vocational education should coordinate and integrate the provision of services.

Title VI: Countercyclical Public Service Employment Program

The provisions of this title are not discussed here because the focus of funding is on temporary employment during periods of high unemployment.

Title VII: Private Sector Opportunities For The Economically Disadvantaged

The purpose of this title is to demonstrate the effectiveness of a variety of approaches to involve the business community in employment and training activities. Each prime sponsor seeking funds under this title must establish a Private Industry Council (PIC) to include, among others, a representative of local education agencies and institutions, but it must have a majority representation from business and industry. This PIC must show evidence that comments on planned activities by the prime sponsor planning council have been satisfactorily considered and that the prime sponsor and the PIC both agree to the plan submitted. This plan is intended to elaborate upon the pertinent Title II plan, and to be integrated with all other initiatives taken under this Act so the funds are used to supplement, not supplant, other activities (Sec. 705(a)). Unlike the prime sponsor planning council, the PIC is permitted to operate programs. The discussions of these local PICs will be of importance to vocational educators.

Title VIII: Young Adult Conservation Corps

This title, like Title VI and Parts B and C of Title IV (Job Corps and Summer Youth Program, respectively) is of tangential importance to the major thrust of this paper.

Summary

The intent in providing the detail exhibited in this section has been to expose readers to enough of the substance of the 1978 CETA Amendments to whet their appetite for more, in which case a complete reading of the Amendments should be undertaken. A summary of relevant provisions is presented in the appendices. Readers must judge for themselves what is applicable to their situation. This section has developed a practical map of the terrain. The burden now lies with the reader to determine what use will be made of this information.

EXAMPLES OF RECENT INSTITUTIONAL CHANGE

Up to this point, only historical developments and current legislation have been examined. With this background, attention can now be turned to early evidence of YEDPA impact on vocational education-CETA cooperation. Early indications reveal a share of YETP funds for in-school programs which is double the mandated twenty-two percent ("A Knowledge Development Plan," Department of Labor, 1978). Caution is urged in drawing any hasty conclusions. Pressure to obligate funds may have enticed prime sponsors to quickly enter into LEA agreements, an action that might not be replicated under forward funding provisions. In addition, it is important to consider the alternative

courses of prime sponsor action. There are indications that prime sponsors sometimes retreat into agreements with LEAs in order to avoid negotiating with CBOs over which they have little control. Both of these interpretive cautions have to do with process issues, per se, not with organizational behavior based on the expected effectiveness of the services promised or labor market opportunities of clients.

The Office of Youth Programs of the Department of Labor also reports that there appears to be a movement away from serving dropouts to dealing with potential dropouts; in cases where out-of-school youth are still targeted, greater emphasis is being placed on return to school ("Impacts of YEDPA," 1978). The willingness of public schools to accept former school leavers would also be expected to be sensitive to declining enrollments associated with demographic trends. It will be important to monitor the impact of these changes on clients. It appears that earmarking of funds may have successfully accomplished greater use of in-school activities. However, this is a process effect. What really matters is the difference this makes in the lives of the youth who participate, both during and after their program tenure. The issue involves what in-school participation means in practice. Are in-school program enrollees integrated into regular classroom activities, which is a possible process goal, or are they kept separated from other students? There is some evidence of integration in this regard (Warzburg, 1978).

Anecdotal evidence indicates that some vocational educators view CETA employment and training programs with disdain because of alleged diminished standards for program completion and certification of competence. The presence of this attitude suggests a need to be alert to situations where YETP resources are accepted by LEAs without a reciprocal commitment to provide appropriate vocational education services. Vocational educators seek substantial control over participant selection and establishment of quality standards. The issue comes down to accountability.

Cooperation between prime sponsors and LEAs has existed in many locations for a long time prior to YEDPA. The National Advisory Council on Vocational Education reports the following examples (Pucinski, 1978):

1. In Alabama, all Title I (now Title II) funds for classroom training go to public vocational education.
2. In Chicago, four times as much goes to vocational education under Title I as under the five percent allotment.
3. In Erie, PA, the prime sponsor gives priority consideration to public institutions which have demonstrated effectiveness in the past.
4. In San Francisco, all Title I classroom training is provided by public schools and community colleges.

An interim report based on ten case studies of YEDPA implementation suggests that:

> CETA-LEA agreements fall into two general groups. Those that set up LEAs as relatively autonomous program agents, and those that set up the LEAs as integral cogs in a coordinated system attempting to ease the transition of youths from school to work. The implications for institutional change vary between the two groups. (Wurzburg, 1978, p. 46)

This interim report concludes that autonomous LEA program agents display limited concern for dropouts or graduates who are deficient in basic skills, focusing their attention instead on expanded services and new services for students already in the school system. But, according to Wurzburg (1978), "there is solid evidence that there is at least one internal institutional change: the emphasis on bringing economically disadvantaged students into the mainstream of ongoing programs" (p. 47). This observation is accompanied by a warning that these programs should be monitored in order to distinguish minimal compliance from instrumental performance on the client's behalf.

Another five case studies have been prepared by a team of HEW and OPY/DOL representatives (Herrnstadt, Horowitz and Sum, March 1978). This volume emphasizes the uniqueness of the LEA-CETA agreement as a new institutional feature, as one would expect from this source. Tentative conclusions reached include the following (Herrnstadt, Horowitz and Sum, March 1978):

1. Four months after program startup, many of the initial apprehensions about the leverage, role and impact of prime sponsors on school programs had subsided.
2. It appears that smaller communities, where staff on both sides were familiar with each other and where new program ideas had been developed but not implemented, generated the more innovative programs.
3. (T)he overall number of disadvantaged youth being served in in-school programs has increased with the advent of YETP.
4. Program regulations hinder the broad exposure of youth to private sector job opportunities....The areas of academic credit, scheduling, extended school day, vacation and graduation requirements deserve much more attention. Many opportunities for youth are missed because of administrative restraints.

The report then highlights five degrees of CETA-LEA integration:

1. Major change--Houston, TX
2. Putting it all together--Worcester, MA
3. Collaboration--Balance-of State, MN
4. Negligible--Fairfax County, VA
5. Business as usual--Los Angeles, CA

These preliminary conclusions must be tempered by a recognition that these initiatives began, at least in this form, in August, 1977. Major program assessment activities are currently underway ("A Knowledge Development Plan," 1978). Many of these activities are being coordinated by four nonprofit intermediaries:

1. Manpower Demonstration Research Corporation (MDRC)--research and demonstration aspects of the 17 sites involved in the Youth Incentive Entitlement Pilot Projects.
2. Corporation for Public/Private Ventures (CPPV)--public and private sector linkages, and replication of a successful community improvement project model.
3. Youthwork--coordinating the incentive awards for exemplary in-school programs. At this time, forty-six projects have been funded in four categories:

   (a) academic credit for work experience
   (b) private sector involvement
   (c) counseling and career guidance
   (d) youth initiated projects

4. Corporation for Youth Enterprises (CYE)--assistance in the development of enterprises run by and employing youth.

The reports which will be prepared by these and related organizations during the next two years have a potential for providing insight into the topic of coordination.

This review of past and present institutional structures describes the organizational possibilities that exist at the present time for vocational education-CETA cooperation. The next question is how these organizational opportunities can be translated into probability statements.

TRANSLATING POSSIBILITIES INTO PRACTICE

The following premises underlie the point of view concerning barriers to coordination that is expressed in this section:

1. National fiefdoms (and state counterparts) in the Congress, executive departments, and lobbying groups limit the extent to which local institutional consolidation and cooperation is possible. These territorial imperatives are nurtured independent of their consequences for client effectiveness.

2. Elaborating upon the point just made, there are important organizational objectives that have little to do with the development of individual employment opportunity.

3. Historical events and present personalities at all jurisdictional levels define, to a large extent, the degree of freedom which exists to recast current organizational relationships.

4. Both the vocational education and CETA systems have, to date, allocated available resources almost entirely on the basis of indicators of alleged need, not in response to remedial promise. This distinction is related to the previous three observations, and is of overwhelming importance.

Vocational education funds are allocated to states on the basis of population size, family income estimates, and target group designations. From the state level, occupational employment opportunities are said to be an important allocation factor, although there is strong evidence that contradicts this (Lecht, 1978; Stevens, 1978). CETA funds are distributed according to estimates of low income, unemployment funds and underemployment levels, and concentration of unemloyment in some cases. Small exemplary and demonstration allotments are made through both systems. Where, though, is explicit consideration given to relative promise of being able to do something about the conditions which have been revealed? There is no necessary connection between the severity of a problem and the likelihood that its solution is known and can be achieved. The surface reasons why federal funds are currently disbursed on the basis of these criteria are well documented. But an immediate task is to achieve a better understanding of what the appropriate relationship between vocational education and CETA is, should be, and can be. These surface reasons are of little interest in this regard, except insofar as vocational educators and CETA prime sponsors are engaged in a common effort to demonstrate still greater need for their services vis a vis all other claims on federal funds.

Through congressional mandate, earmarking of appropriations, and regulatory directive, attempts are being made to focus both vocational education and CETA resources more and more narrowly on economically disadvantaged persons. Three very different explanations can be given for this narrowing of constituency:

1. Limited availability of funds requires greater target efficiency, and this narrowing can be accomplished without stigmatizing vocational education and CETA programs and their clients, to the detriment of all three.

2. This targeting signals a sense of congressional and administrative futility regarding the possibility of achieving genuine promotion of individual employment opportunity through these auspices; the continuing investment of funds through these channels therefore represents a political attempt to placate both program operators and their clients--

in the first case through institutional sustenance, and in the second instance by demonstrating that "we're trying."

3. This focusing demonstrates confidence in the ability of vocational education and CETA organizations, working together in close harmony, to achieve a high priority social goal: a reordering of life-chances through enhanced employment opportunity for those with the bleakest prospects otherwise.

What criteria should be used to select a preferred one of these three interpretations, recognizing that elements of all three apply in most cases, i.e., these are not mutually exclusive categories? Reliance on what is said is not appropriate because the second explanation is generally inadmissable in public discourse, even though it is a subject for private speculation in many quarters. Furthermore, the first and third interpretations involve attribution of unobserved intent.

Consideration of this issue is crucial for deciding what will be sought in the future as evidence of success or failure. In this regard, a curious observation should be noted: little attention has been devoted to distinguishing the contributions made by vocational education and employment and training programs to improving individual employment opportunity. Limited evidence of Congressional, executive and state agency, and program operator attention to client outcomes after leaving these systems is available, despite voluminous evaluation literature (Stevens, 1978). Based on observed actions to date, it is difficult to defend the proposition that either vocational education or CETA programs have been primarily intended to achieve this redistribution of individual well-being. Admittedly, there are technical difficulties involved, and it is promised that new accountability procedures will improve upon what has occurred to date. Also, it is possible that this goal has been sought in a diligent manner, but that we truly do not have sufficient understanding to proceed effectively.

It is impossible to develop the full substance of this point of view here. When process considerations take on a life of their own, it is quite possible to neglect outcomes. This is why the outcomes/process statement of purposes in the CETA Amendments of 1978 was quoted earlier. It also explains why so much of this paper has been devoted to an examination of current organizational structure. The following excerpt from a recent newspaper column, "Terminating Public Policies," summarizes the situation:

> Constituencies are the dominant force in policy politics. No government program is without an organized constituency to protect and nurture it. Those programs that some believe can be easily eliminated without much loss (and perhaps with some gain) are precisely those programs that others believe are absolutely essential. Moreover, people care much more deeply about the continuation of the program from which they directly benefit than about the termination of those programs that they feel are unimportant or wasteful. Those who benefit from a policy may be few, but they understand clearly the personal costs of its termination. They will quickly mobilize to resist any such threat. (Behn, 1978, p. 24)

Seen in this light, the opportunities for vocational education-CETA cooperation which are provided in the CETA Amendments of 1978 represent a Congressional compromise among competing constituent objectives. The preliminary evidence reported from first-year YEDPA activities demonstrates the potential for eliciting a desired institutional response by offering a quid pro quo. Having accomplished this coupling, two crucial research questions remain to be answered:

1. Must earmarking of funds be continued, and must exemplary/demonstration devices be retained to assure continuity of organizational cooperation? That is, must external mandates and sweeteners remain a fact-of-life; or, are they only required to achieve a mutual awareness of the advantages of cooperation?

2. What difference does vocational education-CETA cooperation make in the lives of program clients after they leave?

Answering the first question requires an adequate test of organizational behavior in the presence or absence of incentives. Addressing the second question involves modeling the employment opportunity phenomenon: what determines an individual's labor market opportunities, and the advantage that is derived from them? Is this a deterministic process, or are random factors important? (See Thurow, 1975; Cain, 1976; "Structure of Labor Markets," 1978.)

Notable exceptions notwithstanding, there has been a general failure to use postparticipation employment experience as an important accountability factor for both vocational education and employment and training organizations. This is interpreted as evidence of limited interest in this objective vis a vis self-contained process objectives gauged by the measurement of such events as intake flows, service transactions, and job placements at termination. None of these has direct client well-being connotations. Job placement is a transaction requiring the temporary satisfaction of two parties, a hiring employer and a job aspirant. What occurs thereafter may bear little relationship to this event. Does the new hire perform competently? Is a subsequent career progression exhibited? These aspects of labor market experience are far more important if we are serious about trying to identify stable relationships between institutional skill development and subsequent labor market opportunity.

The issue of considering remedial promise as a factor in resource allocation decisions, supplementing indices of need, is fraught with dangers. The boundary between such consideration and "creaming" practices is not well defined. The important point is that it is necessary to ask explicitly: what is possible?

It would be naive to propose that resources should never be allocated on the basis of process considerations alone. There are legitimate objectives for vocational education and CETA programs other than enhancement of client employment opportunity. The latter has been neglected too long, however, and coordination can neither be discussed intelligently, nor pursued efficiently, until this negligence has been corrected.

RESEARCH PRIORITIES

This paper has combined a brief glimpse at historical origins with an examination of current vocational education-CETA relationships. References are available to the reader who wishes to pursue a particular topic. The major purpose throughout has been to use this foundation to establish a research and development agenda for the immediate future.

An obvious dichotomy which appears in this paper separates internal organizational issues from client impact topics. This is not to say that there are no interdependencies between the two; indeed, the knowledge development thrust of YEDPA, Title IV in the CETA Amendments of 1978, is designed to identify these linkages.

Organizational issues have received undue attention, without adequate consideration of the client consequences of these relationships. A recommended research agenda that is based on this premise follows.

Organizational Behavior Issues

The most important unanswered question is: what are the objectives of each of the following organizations in relation to vocational education and employment and training?

1. The Congressional committees which handle vocational education and CETA legislation and the respective appropriations committees
2. HEW's U.S. Office of Education and DOL's Employment and Training Administration
3. State department of education and prime sponsors
4. Community based organizations
5. Local education agencies
6. State and local elected officials
7. State and national lobbying groups

These objectives must be inferred from what the groups do, not what they say.

After the objectives of each group have been defined, there should be a careful analysis of consistencies and inconsistencies among them. Changes over time in organizational objectives should be documented. The flexibility of each group in adapting goals to changing circumstances should also be considered. Reliable predictions about future legislation and organizational relationships are dependent upon this type of research.

One problem of this approach is the impact on the organizations examined. None of the groups referenced can be expected to embrace an effort to reveal evidence of parochialism in their organizational behavior. Every organization operates

to promote its own objectives. Indeed, the challenge is to take advantage of this knowledge to use this organizational characteristic in ways that might benefit their constituents.

Client Effectiveness Issues

Given my pessimistic conclusion that organizational issues have long dominated attention to associated client consequences, it should come as no surprise that the highest priority is placed on determining the nature of this linkage. Questions requiring answers include; when does consideration of developing individual employment opportunity become explicit? What assumptions are made in these considerations? Is there general agreement on the appropriateness of these premises? If not, why, and does it matter?

Careful attention must be given to the changing context in which these programs exist. What appeared to be successful yesterday may not be worthy of replication today. What worked with a white male constituency may no longer be viable. What was feasible when there was only one type of program available may be vulnerable in the face of competition. The question remains, who can be helped, under what circumstances, at what cost?

APPENDIX A – EVOLUTION OF CETA LAW
PROGRAM TITLES ONLY

ORIGINAL CETA LAW 1973	AS AMENDED, 1974	AS AMENDED, 1977	CETA REENACTMENT 1978
TITLE I – Comprehensive Manpower Services	→	→	
TITLE II – Public Employment Programs	→	→	TITLE II – COMPREHENSIVE EMPLOYMENT & TRAINING SERVICES
TITLE III – Special Federal Responsibilities Part A – Special Target Groups Part B – Research, Training & Evaluation	→ → →	→ → → Part C – Youth Employment and Demonstration Projects	TITLE III – SPECIAL FEDERAL RESPONSIBILITIES Part A – Special National Programs and Activities Part B – Research, Training and Evaluation
TITLE IV – Job Corps	→	→	TITLE IV – YOUTH PROGRAMS Part A – Youth Employment & Demonstration Projects Part B – Job Corps Part C* – Summer Youth Program
	Title VI Emergency Public Service Employment	→	TITLE VI – COUNTERCYCLICAL PUBLIC SERVICE EMPLOYMENT
			TITLE VII – PRIVATE SECTOR OPPORTUNITIES FOR THE ECONOMICALLY DISADVANTAGED
		TITLE VIII Young Adult Conservation Corps →	TITLE VIII – YOUNG ADULT CONSERVATION CORPS

*Section 304 (a) (3) is incorporated as Part C of TITLE IV.

Compiled by: Judy Meyer, Institute of Labor and Industrial Relations, University of Houston, November 21, 1978

APPENDIX B

THE DEPARTMENT OF LABOR ALLOCATES CETA DOLLARS

TO

PRIME SPONSORS FOR DELIVERY OF SERVICES WITHIN THEIR JURISDICTIONAL AREAS (From TITLES II; IV & VI)	GOVERNORS (From TITLE II)	NATIVE AMERICAN ENTITIES (From TITLES III; IV & VI)	MIGRANT & SEASONAL FARM WORKER ORGANIZ. (From TITLES III & IV)
85% of total funds allocated for Title II (A, B, C, & D) and for Title VI 75% of total funds allocated for Title IV-A (subparts 2 and 3) ELIGIBLE UNITS OF LOCAL GOVERNMENT (cities, counties, or consortia) STATES (for services to areas not covered by other prime sponsors) RURAL CONCENTRATED EMPLOYMENT PROGRAMS (CEPs) (limited number of existing CEPs)	6% of all funds available for Title II (parts A, B, & C) for SUPPLEMENTAL VOCATIONAL EDUCATION 1% of all funds available for Title II (parts A, B, & C) for SUPPORT TO THE STATE EMPLOYMENT & TRAINING COUNCIL (SETC) 1% of all funds available for Title II (ALL PARTS) FOR COORDINATION AND LINKAGES WITH EDUCATIONAL AGENCIES AND INSTITUTIONS 4% of all funds available for Title II (parts A, B, & C) for GOVERNOR'S COORDINATION AND SPECIAL SERVICES	NO LESS THAN 4.5% of total funds allocated for Title II (parts A, B, & C) NO LESS THAN 2% of total funds allocated for Title II-D 2% of funds available for Title IV-A (subpart 2) 2% of funds available for Title IV-A (subpart 3) NO LESS THAN 2% of total funds allocated for Title VI	NO LESS THAN 5% of total funds allocated for Title II (Parts A, B, & C) 2% of funds available for Title IV-A (subpart 2) 2% of funds available for Title IV-A (subpart 3)

Compiled by: Judy Meyer, Institute of Labor and Industrial Relations, University of Houston, November 21, 1978

APPENDIX C

FORMULAS FOR ALLOCATING CETA FUNDS TO SPONSORS

	FOR FY '79	FOR FY '80-'82
TITLE II (PARTS A, B & C)		
85% of total funds for II-A,B,C to be distributed to prime sponsors in each of the four fiscal years (FY '79-FY '82)	• 50% relative funds received in FY '78 • 37½% relative number of unemployed • 12½% relative number of low-income adults	• 2/3 of the funds to sponsors will be allocated based on the formula shown for FY '79 • 1/3 of the funds allocated based on relative number of unemployed persons residing in Areas of Substantial Unemployment (ASU) within jurisdiction[1]
TITLE II (PART D)		
85% of total funds to be distributed to prime sponsors in each of the four fiscal years (FY '79-FY '82)	• 25% relative number of unemployed residents • 25% relative number of unemployed residents in in excess of 4½% unemployment rate • 25% relative number of unemployed residents in ASUs[1] • 25% relative number of low-income adults	SAME FORMULA AS SHOWN FOR FY '79, HOWEVER, NOTE CHANGE IN ASU DEFINITION[2]
TITLE VI		
85% of total funds to be distributed to prime sponsors in each of the four fiscal years (FY '79-FY '82)	• 50% relative number of unemployed residents • 25% relative number of unemployed in ASUs[1] • 25% relative number of unemployed residents in excess of 4½%	SAME FORMULA AS SHOWN FOR FY '79, HOWEVER, NOTE CHANGE IN ASU DEFINITION[2]

	FOR FY '79 & FY '80
TITLE IV-A (Subpart 2)	
(YOUTH COMMUNITY CONSERVATION & IMPROVEMENT PROJECTS)	
75% of total funds to be distributed to prime sponsors in FY '79 and FY '80	• All based on relative number of unemployed
TITLE IV-A (Subpart 3)	
(YOUTH EMPLOYMENT AND TRAINING PROGRAMS)	
75% of total funds to be distributed to prime sponsors in FY '79 and FY '80	• 37½% relative number unemployed • 37½% relative number of unemployed residents in ASUs[2] • 25% relative number of low-income adults

[1] ASU refers to areas where the average unemployment rate is at least 6½% for any three consecutive months within the most recent 12-month period.

[2] ASU refers to areas which have an average unemployment rate of at least 6½% for the most recent 12-months.

Compiled by: Judy Meyer, Institute of Labor & Industrial Relations, University of Houston, November 13,1978

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